

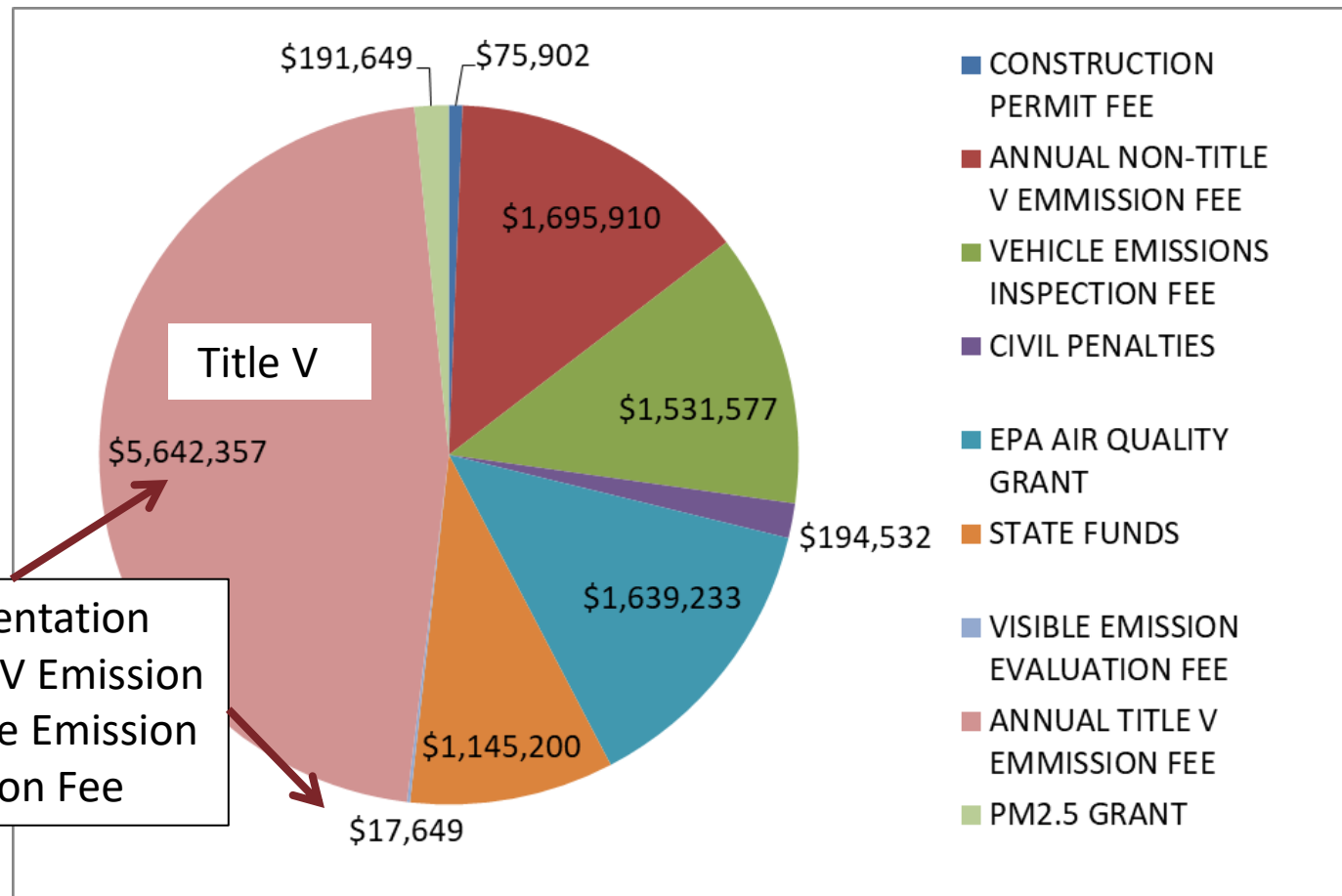


Department of  
**Environment &  
Conservation**

**F2021 Title V Fee Need, Visible  
Emissions Evaluation Course Fees,  
Administrative Changes to Fee Rules**  
October 9, 2019

# How is the Air Division Funded

## Average of 2015-2017



Note: This chart is a simplified representation of APC funding. Actual budgetary and accounting information is much more complicated. Does not include “pass-through” funds or one-time funding. Does not include payments to counties as part of I/M program.

# Activity to Date

- 2016 to 2018 – APC Stakeholder Outreach
- December, 2017 – APC Board Adopted Fee Increase Effective FY2019
- May, 2019 – APC Board Approved FY2020 Workload Analysis – no fee increase
- June, 2019 – Title V Fee Listening Session
- 9/11/2019 – APC Presented TV Workload Analysis and Title V Need to Board
- 9/11/2019 – Title V Fee Listening Session
- 10/4/2019 – Public Notice with Proposed Title V Fee Rule Revisions Sent to Secretary of State for Publishing
- 10/9/2019 – APC Board Briefing on Proposed Rule

# Current Fee Rule

- Base Fee of \$4000
- Minimum Fee of \$7500
- Dollar per Ton Rates

	Allowable	Actual
Non-EGU	\$33.50	\$53.50
EGU	\$47.00	\$75.00

- Total Collections: \$5,654,884\*
- Estimated FY2021 Expenses: \$7,810,839
- FY2021 Ending Reserve: **-\$1,155,955**

\*slightly lower than \$5,799,839 included in 9/11/2019 Board Presentation

# Proposed Title V Fee Rule – Year 1 (FY2021)

- Increase Base Fee from \$4000 to \$5000
- Increase Minimum Fee from \$7500 to \$9000
- Dollar per Ton Rates

	Current Allowable	Proposed Allowable	Current Actual	Proposed Actual
Non-EGU	\$33.50	\$43.50	\$53.50	\$69.50
EGU	\$47.00	\$61.00	\$75.00	\$97.50

- Total Collections: \$7,278,833 (\$1,623,949 increase)
- Estimated FY2021 Expenses: \$7,810,839
- FY2021 Ending Reserve: \$467,994

# Proposed Title V Fee Rule – Year 2 (FY2022)

- Increase Base Fee from \$5000 to \$6000
- Minimum Fee remains at \$9000
- Dollar per Ton Rates

	Proposed Allowable	Proposed Actual
Non-EGU	\$50.00	\$80.00
EGU	\$70.00	\$112.00

- Total Collections: \$8,357,400 (\$1,078,667 increase)
- Estimated FY2022 Expenses: \$8,045,164
- FY2022 Ending Reserve: \$780,230

# Title V Fee Tools

- Used by the Division to Evaluate how changes in Fee rate and Structure will impact Title V Fee Collections
  - Two Tools: One for FY2021, one for FY2022
  - Available to Stakeholders
- Recently Updated to Utilize Best Available Data
- Will be Made Available during Public Comment Period on Air Pollution Control's Title V Fee Web Page
  - APC Will Hold Webinar [probably late October] to Demonstrate Its Use

# Visible Emissions Evaluation Course (Smoke School) Fees

- Current Fees
  - Initial Certification Tennessee Applicant - \$125.00
  - Initial Certification Out-of-State Applicant - \$175.00
  - Recertification Tennessee Applicant - \$95.00
  - Recertification Out-of-State Applicant - \$125.00
- Payment due when Registering for Smoke School (recertification required every six months to maintain certification per EPA Method 9 requirements)
- Draft Revised Fees
  - Initial Certification - \$180.00
  - Recertification - \$150.00



# Administrative Changes

- Clarified provision pertaining to amount of “maintenance” fee
- Change due date for cotton gin non-T5 fees
- Updated information pertaining to payment of fees, including allowance for on-line payment (when available)
- Updated language to reflect use of electronic communications
- Remove requirement that application complete letters be sent certified mail
- Formatting changes recommended by OGC
- Deleted obsolete provisions pertaining to start-up of fee programs
- Updated cross-references
- Minor technical corrections
- Grammatical corrections

# Remaining Schedule Schedule

- 11/25/2019 – Public Hearing & Close of Comment Period
- ~12/4/2019 – Board Package Mail Out
- 12/11/2019 – Board Vote on Proposed Rule

# Questions

